

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	
Michael A. Wolf,)	
)	
Debtor.)	No. 19 C 1978
_____)	
)	
)	
N. Neville Reid, not individually,)	
but solely in his capacity as Chapter 7)	
Trustee for the bankruptcy estate of)	
Michael A. Wolf)	
)	(Bankruptcy Case No. 14 B 27066)
Plaintiff,)	
)	
v.)	
)	
MMQB, Inc., Michael Wolf,)	
Scott Wolf, et al.)	
)	
Defendants.)	

**TRUSTEE’S REPLY IN SUPPORT OF MOTION FOR A RULE
TO SHOW CAUSE WHY MICHAEL WOLF SHOULD NOT BE HELD IN CONTEMPT**

N. Neville Reid, not individually but solely as chapter 7 trustee (the “Trustee”) of the bankruptcy estate of Michael Wolf (the “Debtor”), as his Reply In Support Of Motion For A Rule To Show Cause Why Michael Wolf Should Not Be Held In Contempt (“Motion”), states as follows:

1. On May 9, 2023, Trustee filed a Motion For A Rule To Show Cause Why Michael Wolf Should Not Be Held In Contempt.
2. Michael Wolf's response was due by 05/17/2023.
3. Michael Wolf failed to respond to the Motion.
4. The amended judgment related to the Third Party Citation for which Michael Wolf failed to respond or appear was in favor of the Trustee against MMQB, Inc. in the amount

of \$2,100,000 on October 27, 2022. While a notice of appeal was filed related to the judgment, no stay of the judgment was ever obtained and the appeal was already dismissed as to MMQB, Inc. with the Mandate being filed in this Court on May 19, 2023. See, Docket Nos. 67 and 68.

Wherefore, for all of the foregoing reasons, N. Neville Reid, not individually but solely as chapter 7 trustee of the bankruptcy estate of Michael Wolf, respectfully requests this Court to order Michael Wolf to: (1) appear and show cause why he should not be held in contempt for not complying with the Alias Citation: (2) produce all documents required by the Alias Citation within (7) days; (3) answer the citations interrogatories contained in the Alias Citation within the next seven (7) days; (4) appear for his citation examination and answer all of the questions posed at the examination; and (5) and for all other and further relief that this Court deems just.

Respectfully Submitted,

N. Neville Reid, not individually, but solely
in his capacity as chapter 7 trustee for the
bankruptcy estate of Michael A. Wolf,

/s/ Daniel P. Dawson

One of his attorneys

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CERTIFICATE OF SERVICE

I, Daniel P. Dawson, certify that on May 24, 2023, I caused a copy of the foregoing Reply In Support Of Motion For A Rule To Show Cause Why Michael Wolf Should Not Be Held In Contempt, to be filed electronically through the Court's CM/ECF filing system which will cause the document to be served upon all parties electronically through the Court's CM/ECF filing system, and also served additional parties as listed on the attached Service List via e-mail or First-Class U.S. Mail, as indicated.

/s/ Daniel P. Dawson

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SERVICE LIST

Via ECF Service

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Scott Wolf	scottwolf.0330@gmail.com

Via U.S. Mail or e-mail as indicated

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